

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:	:
AMIMON INC. And AMIMON LTD,	:
	: Case No.: 1 :20-CV-09170-ER
Plaintiff,	:
	: Hon. Edgardo Ramos
v.	:
	:
SHENZHEN HOLLYLAND TECH CO. LTD	: <b><u>NOTICE OF MOTION</u></b>
and EC PRO VIDEO SYSTEMS	:
	:
Defendants.	:
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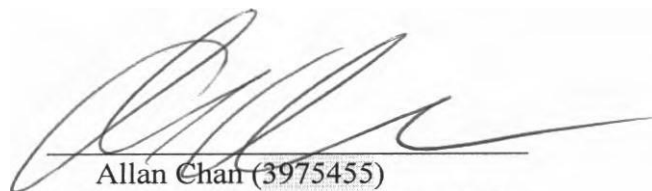
**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and Declaration of Allan Chan, dated March 4, 2021, and all other pleadings and proceedings had herein, Defendants SHENZHEN HOLLYLAND TECH CO. LTD and EC PRO VIDEO SYSTEMS, INC., by their counsel, Allan Chan & Associates, will move this Court before the Honorable Edgardo Ramos, at the United States Courthouse located at 40 Foley Square, New York, New York, as soon as counsel may be heard and at such time as the Court directs, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the First Amended Complaint filed by Plaintiff AMIMON INC. And AMIMON LTD in its entirety, with prejudice, for failure to state a claim upon which relief may be granted, together with such other relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Order entered on January 28, 2021, opposition papers, if any, shall be filed on or before March 25, 2021.

Dated: New York, New York

Respectfully submitted this 4<sup>th</sup> day of March, 2021.

Allan Chan & Associates

A handwritten signature in black ink, appearing to read 'Allan Chan', is written over a horizontal line. Below the line, the text 'Allan Chan (3975455)' is printed.

BY:

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Defendant